



October 9, 2014

United States Environmental Protection Agency - Region 2
DECA - PTSB - Toxic Substances (MS-105)
2890 Woodbridge Avenue (MS-105)
Edison, New Jersey 08837

Attn.: Henry Mazzucca, P.E., Chief

**Re: 14th Quarterly Status Report
PCB Remedial Action
Arsynco, Inc. Site
Carlstadt, New Jersey**

Dear Mr. Mazzucca:

In accordance with Section 5 of the USEPA's *Approval for Risk-Based Clean-up/Disposal of Polychlorinated Biphenyl Remediation Waste* for the Arsynco site, which became effective on July 21, 2009 (the "EPA Approval"), the following provides the 14th Quarterly Status Report for the PCB remedial action at the Arsynco facility.

The following activities/actions have occurred in relation to the site since the last Status Report was submitted to EPA on August 1, 2014:

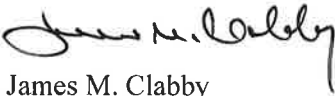
- Arsynco addressed numerous issues that require initiation and completion before the PCB remedy can be fully implemented. These issues/activities included:
 - a. the update of maps, etc. with data generated from the additional, recent PCB samples collected to wrap up delineation in some areas along the area of the drainage ditch along the south side of a portion of Tract 1;
 - b. Preparation of the Multiple Permit Application to NJDEP for the required permits to conduct the PCB remediation on the site, including a Freshwater Wetlands General Permit #4 (GP4), a Coastal General Permit #15, a Waterfront Development Permit (in-water), a Waterfront Development Permit (upland), an Individual Flood Hazard Area Permit, and a NJDEP Section 401 Water Quality Certificate (final permit application package to be submitted to NJDEP in October 2014).
- Arsynco has determined the proposed location of the "Consolidated Material TSCA Disposal Area" and will be submitting the proposed location of this area to EPA in accordance with the Section 3.D) of the Approval. The required plan is currently being finalized and will be submitted to EPA shortly.

- Arsynco also continued toward completion with the installation of the NJDEP-approved in-situ air sparge and soil vapor extraction (AS/SVE) treatment system on the site and received the required permits for air discharge (NJDEP) and water discharge (BCUA) for the system.
- As noted in the last Status Report, Arsynco received a letter from EPA that provided EPA's comments on the financial assurance documents previously submitted by Arsynco. On January 6, 2012, Arsynco submitted an e-mail reply to EPA's letter. The e-mail response was submitted to Ms. Vickie Pane, of EPA, and requested clarification and specificity on EPA's comments to ensure that Arsynco's responses would fully satisfy EPA's requirements. On January 10, 2012, Arsynco submitted a second e-mail to Ms. Pane that provided a signed version of the letter of credit, which addressed one of the comments contained in EPA's October 2011 letter, and again requested a response from EPA clarifying the inquiries stated in the January 6, 2012 e-mail. As of the date of this letter, no response has been received from EPA on these issues.

The approval of the remaining financial surety issues is critical to allow the PCB remediation program at this site to move forward. Therefore, Arsynco respectfully requests EPA's timely review and response to the remaining financial surety questions.

Should you have any questions or require additional information regarding this matter, please feel free to contact me at (732) 295-2144.

Very truly yours,



James M. Clabby
President

cc: James Haklar, USEPA
Jay Nickerson, NJDEP